

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

**IN RE:**

**Karen Oldenburg**  
Debtors.

Case No. 09-58782  
Honorable Rhodes  
Chapter 13

**FOURTH POST-CONFIRMATION APPLICATION FOR ATTORNEY FEES**

Tricia Stewart Terry, counsel for Debtor herein, hereby applies for the approval of attorney fees with the unpaid balance to be paid through the Debtor's chapter 13 plan.

1.

- |  |          |
|--|----------|
| a) Total Amount of Compensation Sought to Be Approved: | \$524.00 |
| b) Total Amount of Expenses to Be Approved:            | \$0.00   |
| c) Balance of Retainer on Hand with Applicant:         | \$0.00   |

2. Services for which an award are sought were rendered 10/25/2011 to 7/23/2012.

3. Services provided included but were not limited to:

**Debtor's counsel reviewed mortgage payment change, case file, and trustee records.  
Debtor's counsel had communication with client re: plan payments, plan options, and case.**

4. Not applicable

5. Said services benefited the estate by: Continued to Distribution to Creditors and maintaining plan feasibility.

The current status of the case and the impact on the plan resulting from approval of this application is: Payments to creditors may be delayed

6. Future services to be provided include continued case monitoring and review as well as motion practice.

7. Not applicable

8. Not applicable

9. The amount of compensation previously awarded by the court is as follows:\$4707.30

**10. A copy of this fee application was sent to the debtor via United States mail on July 24, 2012, 7 days prior to the filing of this fee application. The debtor neither approved nor disapproved the fee application.**

WHEREFORE, the Court is respectfully requested to enter an Order directing the payment of \$524.00 to the undersigned counsel for the Debtor as an administrative expense out of the Debtor's chapter 13 plan for legal services and fees provided.

Dated: July 31, 2012

\_\_\_\_\_/s/Tricia Stewart Terry\_\_\_\_\_  
TRICIA STEWART TERRY (P59522)  
MARRS & TERRY, PLLC  
marrsandterry@yahoo.com  
6553 Jackson Rd  
Ann Arbor, MI 48103  
734-663-0555

**Exhibit 1**

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

**IN RE:**

**Karen Oldenburg**  
Debtors.

Case No. 09-58782  
Honorable Rhodes  
Chapter 13

**ORDER APPROVING FOURTH POST-CONFIRMATION FEE APPLICATION**

This matter having come before the Court upon the application of Marrs & Terry, PLLC, and all interested parties having been served with notice of the application and the provisions of LBR 2016 having been met, no objections to the application having been received and a certification of no response having been filed, and the Court being otherwise fully advised in the premises;

**IT IS HEREBY ORDERED:**

1. The Court approves Applicant's fees and expenses as follows:

PRIOR AWARD(S) FOR FEES:	\$4707.30
PRIOR AWARD(S) FOR COSTS:	\$0.00
TOTAL AWARD TO DATE:	\$4707.30

THIS AWARD FOR FEES:	\$524.00
THIS AWARD FOR COSTS:	\$0.00
TOTAL THIS AWARD:	\$524.00

<u>GRAND TOTAL FEES AND COSTS</u>	\$5231.30
LESS AMOUNT PAID BY DEBTOR AND TRUSTEE	(\$4707.30)
<b>BALANCE TO BE PAID BY TRUSTEE</b>	<b>\$524.00</b>

2. This award covers services rendered and expenses incurred during the time period of 10/25/2011 through 7/23/2012.
3. To the extent that fees and expenses pursuant to this Order are not disbursed by the Chapter 13 Trustee, they shall be paid directly by the Debtor(s) following dismissal.

**Exhibit 2**

**Not applicable**

### **Exhibit 3**

#### Exhibit 4

Attorney	Hourly Rate	Total Number of Hours
Michelle Marrs	\$240	0.40 = \$96.00
Tricia Stewart Terry	\$240	1.40 = \$336.00
Melissa Francis	\$230	0.40 = \$92.00
Jeffrey Bennett	\$215	0.00
		Total \$524.00/2.2 hours=\$238.18

Total Blended hourly attorney rate: \$238.18

Paraprofessionals		
Amie Duffy	\$90	0.00
Jennifer Keener	\$50	0.00
Jessica Hall	\$50	0.00
		Total \$0.00/.0hours=\$0.00

Total Blended hourly paraprofessional rate: \$0.00

**Exhibit 5**

<u>Date</u>	<u>By</u>	<u>Service Summary</u>	<u>Hours/Rate</u>	<u>Amount</u>
In Reference To: <b>CASE ADMINISTRATION (Labor)</b>				
10/25/2011 TT		<i>CASE ADMINISTRATION</i> email from client re 2009 taxes, review trustee records and plan, responded	0.40 at \$240.00/hr	\$96.00
10/26/2011 MF		<i>CASE ADMINISTRATION</i> T/c with client re: 2009 tax return and refund and IRS issues. Review of Trustee records.	0.20 at \$230.00/hr	\$46.00
11/09/2011 TT		<i>Phone Call</i> TC client re plan	0.10 at \$240.00/hr	\$24.00
01/25/2012 MF		<i>CASE ADMINISTRATION</i> Review of Mortgage payment change for direct payment mortgage and schedules, review plan	0.20 at \$230.00/hr	\$46.00
01/26/2012 TT		<i>CASE ADMINISTRATION</i> review trustee records for plan completion, pay history, tax refunds, plan calculation, letter to client, note file	0.40 at \$240.00/hr	\$96.00
02/08/2012 TT		<i>Phone Call</i> TC client re plan options and payments	0.20 at \$240.00/hr	\$48.00
05/02/2012 TT		<i>CASE ADMINISTRATION</i> review trustee records for plan completion, pay history, plan calculation, note file	0.30 at \$240.00/hr	\$72.00
07/23/2012 MM		<i>CASE ADMINISTRATION</i> review trustee receipts and disbursements, review trustee records, plan calculation, note file	0.30 at \$240.00/hr	\$72.00
				<hr/>
				<i>Total Hours:</i> 2.10 hrs
				<i>Labor:</i> \$500.00
				<b>Total Amount: \$500.00</b>
In Reference To: <b>Fee Application Preparation (Labor)</b>				
07/23/2012 MM		<i>FEE APPLICATION PREPARATION</i> prepare fee application	0.10 at \$240.00/hr	\$24.00
				<hr/>
				<i>Total Hours:</i> 0.10 hrs
				<i>Labor:</i> \$24.00
				<b>Total Amount: \$24.00</b>
				<hr/>
				<i>Total Labor:</i> \$524.00
				<b>Total Invoice Amount: \$524.00</b>

## Exhibit 6

### CURRICULUM VITAE

#### MICHELLE MARRS

B.A. University of Wisconsin-Stevens Point

Major-Business Administration

Minor-Economics

JD Thomas M Cooley Law School, Cum Laude

Coursework towards LLM-Wayne State University (15 credit hours)

Partner with Marrs & Terry, PLLC since 1998

Licensed to practice law:

State of Michigan

Federal Courts-Eastern District of Michigan

Western District of Michigan

Northern District of Ohio

2004 NACTT conference attendee

2005 NACBA conference attendee

2007 ABI Detroit Veterans Day Seminar Attendee

Member of the Washtenaw County Bar Association

2008 ABI Conference 6-12-08 thru 6-15-08 Traverse City, MI

2009 ABI Conference Attendee Traverse City MI

2010 ABI Conference Attendee Traverse City MI

#### TRICIA STEWART TERRY

B.S. Eastern Michigan University

Honors Program Graduate

Major-Criminal Justice

Golden Key National Honor Society Member

JD Thomas M Cooley Law School, Cum Laude

Law Review member

Grade Appeals Board member

JD Thomas M Cooley Law School, Cum Laude

Coursework towards LLM-Wayne State University (12 credit hours)

Intern/Associate for General Motor Domestic Tax Staff

Partner with Marrs & Terry, PLLC since 1998-(90% practice in bankruptcy, Eastern and Western District of Michigan since 2002)

Licensed to practice law:

State of Michigan

Federal Courts-Eastern District of Michigan

Western District of Michigan

Northern District of Ohio

2004 NACTT conference attendee

2004 Western District Federal Bar Association conference attendee

2005 Western District Federal Bar Association conference attendee

2006 Western District Federal Bar Association conference attendee

2006 ABI Central States Bankruptcy workshop attendee

2006 Advanced Practice Consumer Bankruptcy Institute Attendee

2006 NACTT conference attendee

2006 ICLE "Understanding the Bankruptcy Reform Act" Seminar Moderator

2007 ABI Central States Bankruptcy Seminar Attendee

2007 ABI Detroit Veterans Day Seminar Attendee

ABI member

Western District Federal Bar Association Member

NACTT member



Washtenaw County Bar Association Member  
2008 ABI Conference 6-12-08 thru 6-15-08 Traverse City, MI  
2009 ABI Conference Attendee Traverse City MI  
2010 ABI Conference Attendee Traverse City MI

MELISSA D. FRANCIS

B.A. Michigan State University James Madison College  
Major-International Relations  
JD Wayne State University Law School  
Associate attorney Marrs & Terry, PLLC  
Associate attorney Kilpatrick & Associates P.C.-focusing on bankruptcy creditor representation.  
Licensed to practice law:  
State of Michigan  
United States District Court, Eastern and Western District of Michigan  
United States Supreme Court Bar

Delta Theta Phi Metro Detroit Alumni Senate, past Dean  
American Bankruptcy Institute Member  
Consumer Bankruptcy Association Member  
2005 CBA Seminar on BAPCPA attendee  
2006 ABI Central States Seminar Attendee  
2007 Consumer Bankruptcy Nuts & Bolts Seminar Attendee  
2007 ABI Central States Bankruptcy Seminar Attendee  
2007 ABI Detroit Veterans Day Seminar Attendee  
2008 ABI Conference 6-12-08 thru 6-15-08 Traverse City, MI  
2009 ABI Conference Attendee Traverse City MI  
2010 ABI Conference Attendee Traverse City MI

JEFFREY G. BENNETT

B.S. Eastern Michigan University, *Cum Laude*  
Major: Criminal Justice, Public Law, and Government  
Honors: President of the Adahi Chapter of EMU's Mortar Board

J.D., George Washington University National Law Center, *Cum Laude*  
Honors: Scholarship Board of Trustee's

Auld, Hortin, & Bennett, Ann Arbor, MI General Practice including Bankruptcy 2000-2007

Licensed to Practice Law:  
State of Michigan  
United States District Court, Eastern and Western District of Michigan

American Bankruptcy Institute Member

2002 United States Bankruptcy Court Western District of Michigan Chapter13 Nuts and Bolts Conference Attendee  
2007 ABI Detroit Veterans Day Seminar Attendee  
2009 ABI Conference Attendee Traverse City MI  
2010 ABI Conference Attendee Traverse City MI

ROBERT KEYES

B.S. University of Illinois – Urbana Champaign  
Aeronautical & Astronomical Engineering  
High Honors

Course work in Mathematical Theory - University of Illinois – Urbana-Champaign  
M.S.E. University of Michigan

Computer, Information, & Control Engineering  
J.D. Wayne State University – Detroit, MI  
Associate attorney Marris & Terry, PLLC  
Solo Practice – Robert Keyes Law, 2009-2001, 90% bankruptcy EDMI

Licensed to practice law:

State of Michigan  
Federal Court-Eastern District of Michigan  
Member of Washtenaw County Bar Association  
Co-chair of Washtenaw County Bar Association Bankruptcy Law Section  
Past Co-chair of Washtenaw County Bar Association Criminal Law Section

2009 Fall Detroit Consumer Bankruptcy Conference  
2010 Fall Detroit Consumer Bankruptcy Conference

KAITLY A. SUNDT

B.A. Michigan State University, *Cum Laude*

Major: Psychology  
Honors: President of Pre-Law Society, member of Psi Chi the International Honors Society in Psychology,  
Dean's List

J.D., Wayne State University Law School  
Honors: Scholarship Board of Trustee's

Associate Attorney, Marris & Terry, PLLC  
Law Clerk, The Stempien Law Firm, Northville, MI General Practice  
Licensed to Practice Law:

State of Michigan  
United States District Court, Eastern District of Michigan

Detroit Metropolitan Bar Association  
American Bar Association

JENNIFER KEENER-LEGAL ASSISTANT

2004-present Legal Assistant at Marris & Terry, PLLC-100% focus on Chapter 13 bankruptcy cases for both Eastern and Western District of Michigan.  
2007 Western District Federal Bankruptcy Seminar Attendee  
Active Member of The Association of Legal Assistants

JESSICA L. HALL-LEGAL ASSISTANT

2006-present Legal Assistant at Marris & Terry, PLLC-Split duties between Chapter 7 and Chapter 13 bankruptcy cases for both Eastern and Western District of Michigan.  
Active Member of The Association of Legal Assistants

AMIE DUFFY-PARALEGAL

2008-present Paralegal at Marris & Terry, PLLC-Split duties between Chapter 13 bankruptcy cases for the Eastern and Western District of Michigan and General Practice  
B.S. Madonna University, 2007  
Honors Program graduate

Major-Paralegal Studies  
Certified Paralegal

ALEX SAVICKAS-PARALEGAL

06/2011->Present Marrs & Terry, PLLC

Title: Legal Assistant 100% focus on Chapter 13 bankruptcy cases IN Eastern District of Michigan  
Law Office of Georgette David 06/2009->03/2011

Title: Process Server/ Research Assistant

Effectuated service upon a defendant for a Collections case.

Conducted research for an ERISA matter with a focus on determining which specific court's caselaw provided the client with the most favorable grounds for successful litigation.

Vincent and Fifelski, PC

09/2008->08/2009

Title: Court Runner/Clerical Assistant

Filed legal documents with courthouses in Wayne County, Washtenaw County and Lenawee County.

Law Office of Linda A. Phillips

06/2008 -> 09/2008

Title: Office Assistant Filed legal documents with the 22<sup>nd</sup> Circuit Court, Ann Arbor, MI.

Graduated with a Bachelor of Science in Paralegal Studies in May 2010. Successfully completed Tort Law, Business Law, Real Estate Law, Family Law, Court Forms and Office Technology while a Paralegal Major at EMU.

Completed International Law courses in both England and The Netherlands while studying abroad for the 2007-2008 academic year.

## Exhibit 7

Expenses:	\$0.00
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**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

**IN RE:**

**Karen Oldenburg**  
Debtors.

Case No. 09-58782  
Honorable Rhodes  
Chapter 13

**NOTICE OF APPLICATION FOR ATTORNEY FEES**

Tricia Stewart Terry, counsel for Debtor, has filed papers with the court requesting attorney fees for work done during debtor's Chapter 13 bankruptcy.

Total Amount of Compensation Sought to Be Approved:     \$524.00

Total Amount of Expenses to Be Approved:                     \$0.00

Balance of Retainer on Hand with Applicant:                   \$0.00

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to allow the application for attorney fees, or if you want the court to consider your views on the motion, then within 21 days, you or your attorney must:

File with the court a written response or an answer, explaining your position at:

United States Bankruptcy Court  
211 W. Fort Street  
Detroit, MI 48226

If you mail your response to the court for filing, you must mail it early enough so the court will receive it on or before the date stated above.

You must also mail a copy to:

Tricia Terry  
Marrs & Terry, PLLC  
6553 Jackson Rd  
Ann Arbor, MI 48103

Krispen Carroll  
719 Griswold  
Suite 1100  
Detroit, MI 48226

If you or your attorney does not take these steps, the court may decide that you do not oppose the relief sought in the application and may enter an order granting that relief.

Dated: July 31, 2012

\_\_\_\_\_/s/Tricia Stewart Terry\_\_\_\_\_  
TRICIA STEWART TERRY P59522  
Marrs & Terry, PLLC  
marrsandterry@yahoo.com  
6553 Jackson Rd  
Ann Arbor, MI 48103  
734-663-0555